

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

1) VIDEO GAMING TECHNOLOGIES, INC.,	)	
	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 4:17-cv-00454-GKF-jfj
	)	
1) CASTLE HILL STUDIOS LLC	)	
(d/b/a CASTLE HILL GAMING);	)	
2) CASTLE HILL HOLDING LLC	)	
(d/b/a CASTLE HILL GAMING); and	)	
3) IRONWORKS DEVELOPMENT, LLC	)	
(d/b/a CASTLE HILL GAMING)	)	
	)	
Defendants.	)	

**PLAINTIFF VIDEO GAMING TECHNOLOGIES INC.’S  
IDENTIFICATION OF EXTANT TRADEMARK INFRINGEMENT CLAIMS**

Video Gaming Technologies (“VGT”) submits the following identification of its extant trademark infringement claims, per the Court’s September 28, 2018 Minute Order (Dkt. 142). VGT has also asserted claims for trade dress infringement, unfair competition, and misappropriation of trade secrets and confidential business information.

As described in VGT’s First Supplemental Response to CHG’s Interrogatory No. 1, VGT alleges that CHG has infringed trademarks that VGT uses in connection with the following four series of three-reel mechanical bingo-based casino games: Crazy Bill; Mr. Money Bags; Polar High Roller; and Greenback Jack.

As also described in the response, for each of the games within these series, VGT intends to rely on the following marks: the game’s word marks (*i.e.*, the game’s title); the game’s logo marks (*i.e.*, the game’s title in stylized form along with design elements immediately surrounding the game’s title); the artwork that appears on each panel of the game cabinet; and the game’s

characters (*i.e.*, Crazy Bill, Dynamite Daisy, Mr. Money Bags, the Polar High Roller arctic animals, and Greenback Jack).

The foregoing marks include 11 federal trademark registrations and applications.

September 28, 2018

/s/ Gary M. Rubman

Graydon Dean Luthey, Jr., OBA No. 5568  
GABLE GOTWALS  
1100 ONEOK Plaza  
100 West Fifth Street  
Tulsa, OK 74103-4217  
Telephone: (918) 595-4821  
Facsimile: (918) 595-4990  
dluthey@gablelaw.com

Gary M. Rubman  
Peter A. Swanson  
Michael S. Sawyer  
Rebecca B. Dalton  
COVINGTON & BURLING LLP  
One CityCenter  
850 Tenth Street, NW  
Washington, D.C. 20001-4956  
Telephone: (202) 662-6000  
Facsimile: (202) 778-5465  
grubman@cov.com  
pswanson@cov.com  
msawyer@cov.com  
rdalton@cov.com  
(admitted pro hac vice)

Neil K. Roman  
COVINGTON & BURLING LLP  
The New York Times Building  
620 Eighth Avenue  
New York, NY 10018-1405  
Telephone: (212) 841-1221  
Facsimile: (212) 841-1010  
nroman@cov.com  
(admitted pro hac vice)

***Counsel for Video Gaming Technologies, Inc.***

**CERTIFICATE OF SERVICE**

I hereby certify that on September 28, 2018, I filed the foregoing Plaintiff Video Gaming Technologies Inc.'s Identification Of Extant Trademark Infringement Claims via ECF, which caused a true and correct copy of the foregoing motion to be delivered to the following counsel:

Robert C. Gill  
Thomas S. Schaufelberger  
Matthew J. Antonelli  
Henry A. Platt  
SAUL EWING ARNSTEIN & LEHR, LLP  
1919 Pennsylvania Avenue, NW, Suite 550  
Washington, D.C. 20006  
(202) 295-6605  
(202) 295-6705 (facsimile)  
robert.gill@saul.com  
tschauf@saul.com  
matt.antonelli@saul.com  
henry.platt@saul.com

Sherry H. Flax  
SAUL EWING ARNSTEIN & LEHR, LLP  
500 E. Pratt Street, Suite 900  
Baltimore, Maryland 21202  
(410) 332-8764  
(410) 332-8785 (facsimile)  
sherry.flax@saul.com

James C. Hodges, OBA 4254  
JAMES C. HODGES, PC  
2622 East 21st Street, Suite 4  
Tulsa, OK 74114  
Telephone: (918) 779-7078  
JHodges@HodgesLC.Com

Duane H. Zobrist  
Jonathan S. Jacobs  
ZOBRIST LAW GROUP PLLC  
1900 Arlington Blvd. Suite B  
Charlottesville, VA 22903  
Telephone: (434) 658-6400  
dzobrist@zoblaw.com  
jjacobs@zoblaw.com

*Attorneys for Defendants*

/s/ Gary Rubman